

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
NORTHERN DIVISION**

SECURITIES AND EXCHANGE COMMISSION, :
Plaintiff, :
v. :
AIC, INC. et al., :
Defendants, :
and :
ALLIED BEACON PARTNERS, INC. (f/k/a :
Waterford Investor Services, Inc.) et al., :
Relief Defendants. :
No. 3:11-cv-00176

**OPENING BRIEF IN SUPPORT OF
PLAINTIFF'S RENEWED MOTION TO COMPEL DISCOVERY**

Federal Rule of Civil Procedure 37 “establishes the mechanisms by which Rules 26 to 36 can be made effective.” 8B Charles Alan Wright et al., Federal Practice and Procedure § 2281 (3d ed. 2013). Here, the Court has already ordered the AIC Defendants and the Relief Defendants to comply with their discovery obligations. (Doc. 85.¹) Simply put, the AIC Defendants and the Relief Defendants should comply with what was previously ordered and take those other reasonable steps previously requested by the Commission and enumerated in this Renewed Motion. (See accompanying motion.)

¹ The term “AIC Defendants” collectively refers to defendants AIC, Inc., Community Bankers Securities, LLC, and Nicholas D. Skaltsounis. The term “Relief Defendants” collectively refers to relief defendants Allied Beacon Partners, Inc. (f/k/a Waterford Investor Services, Inc.), Advent Securities, Inc., and Allied Beacon Wealth Management, LLC (f/k/a CBS Advisors, LLC).

Respectfully submitted,

Dated: May 24, 2013.

s/ Michael J. Rinaldi
G. Jeffrey Boujoukos
Michael J. Rinaldi
Scott A. Thompson

Attorneys for Plaintiff:

SECURITIES AND EXCHANGE COMMISSION
Philadelphia Regional Office
701 Market Street, Suite 2000
Philadelphia, Pa. 19106
Telephone: (215) 597-3100
Facsimile: (215) 597-2740
RinaldiM@sec.gov

CERTIFICATE OF SERVICE

I hereby certify, this twenty-fourth day of May, 2013, that I served a true and correct copy of the foregoing Opening Brief in Support of Plaintiff's Renewed Motion to Compel Discovery, by the means indicated, upon the following:

Heather G. Anderson, Esq.
Reeves, Herbert & Anderson, P.A.
Tyson Place, Suite 130
2607 Kingston Pike
Knoxville, Tenn. 37919
(by the Court's electronic filing system)

Steven S. Biss, Esq.
300 W. Main St., Ste. 102
Charlottesville, Va. 22903
(by the Court's electronic filing system)

Mr. John B. Guyette
2559 53rd Avenue
Greeley, Colo. 80634
(by first-class mail, postage prepaid)

Mr. John R. Graves
4300 W. Francisco Road, Unit 11
Pensacola, Fla. 32504
(by first-class mail, postage prepaid)
and

John Robert Graves, #79185-083
Oakdale FDC
P.O. Box 5010
Oakdale, La. 71463
(by first-class mail, postage prepaid)

s/ Michael J. Rinaldi
Michael J. Rinaldi